

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LEON WEINGRAD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

IBAN GLOBAL LLC

and

LIVEFREE EMERGENCY RESPONSE,
INC. D/B/A LIFE BEACON

Defendants.

Case No. 24-4212

**STIPULATED MOTION TO SET ASIDE ENTRY OF DEFAULT
OF DEFENDANT LIVEFREE EMERGENCY RESPONSE, INC. D/B/A LIFE BEACON**

Pursuant to Fed. R. Civ. P. 55(c) and 60(b), Defendant LiveFree Emergency Response, Inc. dba LifeBeacon (“**Defendant LiveFree**”) and Plaintiff Leon Weingrad (“**Plaintiff**”), by and through their undersigned counsel, hereby stipulate and jointly move the court to set aside the Entry of Default entered against Defendant LiveFree on September 11, 2024. The basis for this motion is an issue regarding service of the Complaint. In addition, Defendant LiveFree has agreed to waive service and agreed to provide a response to the Complaint in this matter within seven (7) days of entry of an order granting this motion. A proposed order has been submitted herewith.

Respectfully submitted,

STEVE HARVEY LAW LLC

/s/ Stephen G. Harvey

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Counsel for Plaintiff Leon Weingrad

STIPULATED AND DATED: September 16, 2024

CERTIFICATE OF SERVICE

I also hereby certify that September 16, 2024, I filed a true and correct copy of the **STIPULATED MOTION TO SET ASIDE ENTRY OF DEFAULT OF DEFENDANT LIVEFREE EMERGENCY RESPONSE, INC. D/B/A LIFE BEACON** via the Court's electronic case filing system, which effectuated service on all counsel of record.

/s/ Stephen G. Harvey